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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-10943 (MEW)
)
) (Jointly Administered)
)

**NOTICE OF FILING OF PROPOSED ORDER
APPROVING FIRST AMENDED LIQUIDATION PROCEDURES**

PLEASE TAKE NOTICE that the above-captioned debtors (collectively, the “Debtors”) toggled to the Liquidation Transaction pursuant to the *Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 1166-1] (the “Plan”).²

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Plan.

PLEASE TAKE FURTHER NOTICE that on May 5, 2023, the Debtors, pursuant to Article IV.D.1 of the Plan, filed the Liquidation Procedures (the “Liquidation Procedures”).

PLEASE TAKE FURTHER NOTICE that on May 27, 2023 the Plan Administrator established under the Plan filed the *Notice of Filing of First Amended Liquidation Procedures* [Docket No. 1419] (the “First Amended Liquidation Procedures”).

PLEASE TAKE FURTHER NOTICE that the Plan Administrator hereby files the proposed *Order (I) Approving First Amended Liquidation Procedures and (II) Granting Related Relief* (the “First Amended Liquidation Procedures Order”), attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that the hearing at which the United States Bankruptcy Court for the Southern District of New York (the “Court”) will consider approval and entry of the First Amended Liquidation Procedures Order will be held before the Honorable Michael E. Wiles of the United States Bankruptcy Court for the Southern District of New York on **June 6, 2023, at 11:00 a.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that copies of the First Amended Liquidation Procedures and other papers filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/Voyager>. You may also obtain copies of the First Amended Liquidation Procedures and other papers filed in these chapter 11 cases by visiting the Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

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Dated: New York, New York
June 5, 2023

MCDERMOTT WILL & EMERY LLP

/s/ Darren Azman

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